

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

LOREN OWENS,

Plaintiff,

Case No. 1:24-CV-00547

Hon. Jane M. Beckering

v

DOES 1-133,

Joshua S. Goodrich, J.D., LL.M. (P83197)
LIGHTHOUSE LITIGATION PLLC
5208 W. Saginaw Hwy 81142
Lansing, Michigan 48908
269.312.7435
jsgoodrich@lighthouse-litigation.com

Attorneys for Plaintiff

Janet Ramsey (P63285)
WARNER NORCROSS + JUDD LLP
150 Ottawa Ave., NW, Ste. 1500
Grand Rapids, Michigan 49503
616.752.2736
jramsey@wnj.com

Jeffrey B. Pertnoy (PHV)
AKERMAN
Three Brickell City Centre
98 Southeast Seventh Street
Miami, Florida 33131
305.982.5524
Jeffrey.pertnoy@akerman.com

Thomas B. Fullerton
Akerman LLP
71 S. Wacker Dr., Ste. 4600
Chicago, IL 60606
312.634.5726
Thomas.Fullerton@akerman.com

*Attorneys for Defendants Tyler Long and
Wesley Cunha*

Jamey R. Campellone
GREENSPOON MARDER LLP
200 East Broward Blvd., Suite 1800

Fort Lauderdale, FL 33301

Tel: 954.527.6296

Email: jamey.campellone@gmlaw.com

Email: gabby.mangar@gmlaw.com

*Attorneys for Defendant, Adroit Health
Group, LLC*

CERTIFICATE OF COMPLIANCE
W.D. Michigan LCivR. 7.1(d)

I, Joshua S. Goodrich, J.D., LL.M. counsel for the Plaintiff in the above-captioned case, hereby certify the following in compliance with Local Civil Rule 7.1(d):

Attempt to Obtain Concurrence:

On September 26, 2024, at 4:24 AM EST, I emailed a proposed order and subpoena, along with relevant attachments, to all opposing counsel and members of their firm listed for filing on the Courts electronic filing system, requesting their review and concurrence pursuant to Judge Green's Order (ECF No. 44).

jamey.campellone@gmlaw.com
jramsey@wnj.com
jeffrey.pertnoy@akerman.com
Meagan.Nicholson@gmlaw.com
thomas.fullerton@akerman.com
gabby.mangar@gmlaw.com
djakubowski@wnj.com
rkiefer@wnj.com
marylin.herrera@akerman.com
johanna.womack@akerman.com

The email provided an explanation of the basis for the proposed order and invited feedback to engage in an interactive process.

Conference with Opposing Counsel:

On September 26, 2024, at 10:46 AM EST, I received a response from Ms. Jante Ramsey, Esq., counsel for Defendants Long and Chuna, indicating that her team would review the proposed order and provide a redlined version, but due to scheduling conflicts, a response could not be provided that day. No further communication or redlined version has been received as of the filing of this motion.

Participants in the Conference:

Joshua S. Goodrich, J.D., LL.M. (Counsel for Plaintiff)

Ms. Jante Ramsey, Esq. (Counsel for Defendants Long and Chuna)

Date, Time, and Duration of Conference:

The email conference occurred on September 26, 2024, between 4:24 AM EST and 10:46 AM EST. No other response or additional discussion occurred.

Description of Issues Addressed:

The issues addressed during the email correspondence included the contents of the proposed order and subpoena, the requirement to narrowly tailor the subpoena, and the compliance with the Court's directive to submit a collaborative draft. No further issues were resolved, and no concurrence has been provided by the opposing counsel.

Despite reasonable efforts to confer and engage in good faith, the parties were unable to resolve the issues, and court intervention remains necessary.

Respectfully submitted,

Date: September 30, 2024

/s/ Joshua S. Goodrich, J.D., LL.M.
Joshua S. Goodrich, J.D., LL.M. (P83197)
Lighthouse Litigation PLLC
52080 W. Saginaw, Hwy., 81142
Lansing, MI 48917
(269) 312-7435
jsgoodrich@lighthouse-litigation.com